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## REMARKS

Claims 1-4, 7, and 34-46 were previously pending in this application. Claims 1 and 36 have been amended. Specifically, claim 1 has been amended to recite a snap clip and a collar constructed and arranged to receive and locate a connecting sleeve. These amendments are supported throughout the specification, for example, at paragraphs 44 and 45. Specifically, paragraph 45 recites a resiliently biased snap clip. Claim 36 has been amended to recite a resiliently biased snap. This amendment is supported in the specification at paragraph 45. New dependent claims 47 and 48 have been added and include subject matter removed from independent claim 1. As a result claims 1-4, 7 and 34-48 are pending for examination with claims 1 and 36 being independent claims. No new matter has been added.

## Rejections Under 35 U.S.C. §103

Claims 1-4, 7, and 34-46 were rejected under 35 U.S.C. §103 over U.S. Patent No. 6,017,451 to Kopf (hereinafter Kopf) in view of U.S. Patent no. 6,048,454 to Jenkins (hereinafter Jenkins). This rejection is respectfully traversed.

Applicants maintain their assertion that the Examiner has mischaracterized the flanges of Kopf by equating them to collars. The flat flanges 230 of Kopf are not collars even under the Examiner's own definition of collar as a round flange to restrain motion. On their own, the flat faced flange of Kopf do not restrict motion, but instead require additional mounting hardware or welding to restrict motion of housing 86.

As such, Kopf fails to disclose, teach, or suggest a membrane filtration system comprising, in part, at least one submodule comprising an elongate bundle of semipermeable polymeric fibers attached to a connecting sleeve having a locking formation and a connecting collar connected with the housing and constructed and arranged to receive and locate the connecting sleeve, the collar releasably secured to the submodule by a snap clip as recited in independent claim 1. Similarly Kopf fails to disclose, teach, or suggest a membrane filtration system comprising a plurality of first collars attached to a first housing, the collars constructed and arranged to receive and locate a first connecting sleeve, and a plurality of resiliently biased snap clips releasably connected to one of the plurality of first collars and the connecting sleeve as recited in independent claim 36.

Jenkins discloses an oil filter pack assembly including a Mormon clamp 28 that engages annular lips 24, 27 of top and bottom housing components 22, 23, respectively. However,

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Jenkins fails to cure the deficiencies of Kopf. Moreover, clamp 28 of Jenkins is a compression type clamp coupling used to connect two elements with a face seal. In order for the coupling to seal, force is required to push the faces together thereby compressing the seal. This force is provided by contacting the coupling having a specifically designed cross-section to provide two opposing angled faces which bear on matching angled surfaces 24, 27. In use, the coupling is applied around the two elements to be sealed and then contracted usually with a screw thread or lever 281 which causes the angled surfaced on the elements to be forced toward the center of the coupling, thereby reducing the spacing between them and compressing the seal. In practice, this design will not work if the coupling is not externally radially compressed by some means because the force required to radially compress the coupling is so large that the coupling could not be assembled if it was solely resiliently biased. Jenkins, therefore, fails to disclose a resiliently biased snap clip.

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As such, independent claims 1 and 36 are, patentable over Kopf and Jenkins, either alone or in combination. Claims 2-4, 7, 34-35 and 37-48 depend directly or indirectly from claims 1 and 36, and are patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

## **CONCLUSION**

In view of the foregoing amendments and remarks, reconsideration is respectfully requested. This application is now in condition for allowance; a notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicants' attorney at the telephone number listed below.

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If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicants hereby request any necessary extension of time. Please charge the extension fee and any other deficiency to Deposit Account No. 50/2762.

Respectfully submitted, Warren Thomas Johnson et al., Applicants

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